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Ministry of Advanced Education and Skills Development (MAESD)  
Mowat Block  
900 Bay Street  
Toronto, ON M7A 1L2  
[lifelonglearning@ontario.ca](mailto:lifelonglearning@ontario.ca)

**Re: Public consultation about ways to improve adult education in Ontario**

Dear Consultation Team:

The Festival of Literacies is an initiative to bring adult literacy practice and research together to address challenges facing learners and practitioners. We are a group of researchers, practitioners, and learners with an interest in social justice, participatory democracy, and policy dialogue in relation to adult literacy. Although we are housed in the Ontario Institute for the Studies in Education at the University of Toronto (OISE/UT), our opinions are in no way representative of those of OISE or the University. Nor do they reflect the views of the organizations that we are individually associated with.

In this letter we have focused our response on the strategies MAESD has identified for:

- improving system intake, guidance, and pathway planning; and
- strengthening the recognition of core competencies for success in a 21st century economy and society.

This specific focus allows us to review an anticipated inter-connected accountability and reporting system, which is likely to extend from the intake process (with adaptations) currently used by the Literacy and Basic Skills (LBS) program to both ESL and adult credit.

**We recognize that the first objective** is being addressed in partnership with *Code for Canada*, and a digital solution that provides information navigation is being developed. We also see that the planned solution will not only provide *information about the system*, but it may also be used to collect and share *information about learners and their learning progress and outcomes* for referrals, tracking, and accountability purposes. **We also recognize that the second objective**, the integration of an existing set of core competencies, could be used to support intake assessment and supply data related to progress and outcomes. We understand that this objective implies that MAESD has some clear plans about the way it wants to design an

accountability system, and this may include a novel way to articulate adult learner progress, outcomes and gains, requiring managers, educators and administrators with expertise in their systems to participate in “professional development opportunities” in order to “learn how best to use this new resource with adult learners.” However, we are concerned that MAESD is rushing to develop a virtual accountability and reporting system, using an abstract and one-dimensional structure that will be overlaid onto the existing triad of adult education providers. In response to “*Government, service providers, and other key stakeholders will be partners in ensuring accountability for learner outcomes*”, while we are not against the development and use of an accountability system, we strongly recommend that the (further) development of the system should reflect the current realities of the diverse and complex adult education systems in Ontario. There is a need for careful and collaborative review of existing accountability mechanisms, and a gradual approach to develop and introduce new ones.

Supporting our concern is the following statement: *The further exploration of a core competency framework for Ontarians will be guided by the efforts **already being undertaken** by the province.* This includes a reference to three competency/skill frameworks: 1) Government of Canada’s [Essential Skills](#); 2) the Ministry of Education’s [21st Century Competencies](#), and 3) the Council of Ministers of Education Canada (CMEC) [pan-Canadian global competencies](#). Challenging the assumption that “*essential skills and core competencies*” are helpful to learners and organizations delivering adult education programs and “*meaningful to Ontarians over the course of their learning and working lives*”, we would like to raise some evidence-based critique and concerns about their use in education systems.

As the province pushes forward on the competency framework, we believe it is prudent to ask two critical questions: Who benefits from these competency lists and frameworks? Whose interests are served? We recognize also that essential skills and core competencies are attractive to policymakers, particularly when designing accountability systems and assembling managerial frameworks. However, assumptions about transferability, manageability, learning and skill development are flawed and simply are not supported in the research. *[T]he abstract categories...which work well to make skills administrable as part of a policy process may not work very well in making everyday skills teachable, learnable, usable, and eventually transferable in real working environments* (Jackson, 2005, p. 18). There appears to be a lack of critical analysis about policy oversight on research on situated/context-based learning. Ideally, the government’s role in supporting competency development is to produce policies that are built upon evidence-based research on situated contexts (workplace and training programs). Evidence suggests that the existing mechanisms of core competencies warrant more study to expand the intended universal competency framework.

Without the inclusion of the extensive research on situated/context-based learning the construction of a core competencies framework will ultimately **introduce a series of distortions into the system**. The notion of a universal framework approach to skills and competence development tends to render the dynamic learning/training process to a complication of static objects primarily for the sole purpose of measurement and comparison. As

such the core competencies framework essentially devalues and eliminates the achieved knowledge and competence of learners/workers. This approach also unfairly **imposes a set of universal concepts and accompanying outcomes-based standards on a non-standardized system with non-standardized learner experiences**. Failure to recognize individual needs of learners is most likely to lead to failure of the system in meeting these needs. The competencies are **too broad and abstract to be meaningful on their own**. Recognition of learning, whether it is identified as designated skills and/or competencies require a relational context where the practice of such skills and competencies have meaningful results. As such, a constructed framework of core competencies **introduce more barriers for learners**. Such 2-dimensional frameworks (that are mostly for the managerial purpose of data accumulation) also have embedded barriers for 'hard-to-reach/vulnerable' adults such as those seeking basic skills programming. (Atkinson, 2012; Olesen, 2013). Further, the competencies as currently envisioned by the province will **erode the value of credentials in the system**. Broadly recognizable credentials are crucial for adult learners who seek to improve their life choices and opportunities. A core competencies framework, potentially competing with the already existing credentials such as the OSSD, is confusing at best offering little value or meaning for learning and learners. It could also be detrimental if used as means to evaluate learners and programs, potentially interfering with existing credentialing systems and making them even more challenging for adults to achieve. As a result, the competency framework is likely to **become a barrier between programs and employers**. While the intent is to bridge school and work, employers are looking for credentials and industry specific or occupation specific knowledge and skills. Lastly, core competencies describing personality traits and behaviours often **assume a deficit character**. They can impede efforts to promote equality, diversity and examine broader systemic barriers.

In closing, we thank the Ministry for the opportunity to provide comment on the province's next steps in improving adult education in Ontario. At the same time, we also urge the Ministry to actively and proactively build and maintain connections with practitioners and researchers in the field to ensure that Ontario's adult education policies and programs serve and support all learners in the province.

Sincerely,

On behalf of the **Festival of Literacies**

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